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Franklin A. Rothman Jeremy Schneider Robert A. Soloway David Stern

Rachel Perillo

By ECF

Hon. Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Hicham Kabbaj 20 Cr.08 (RMB)

Dear Judge Berman:

I am the attorney for Hicham Kabbaj, the defendant in the above-named matter. This letter is respectfully submitted with the consent of the government, by AUSA Ni Qian, to request a thirty-day adjournment of the sentencing proceeding currently scheduled for January 20, 2022 at 10:30 a.m., along with a corresponding adjournment of the parties' deadlines to file sentencing submissions.

An adjournment is needed because we are still in the process of collecting medical records that are to be included with our sentencing submission. In particular, we have been working to obtain medical records for Mr. Kabbaj's wife who is being treated for breast cancer and has been hospitalized throughout the last year. Mrs. Kabbaj's treating physician has been out of the country, which has delayed our receipt of the records, but we expect to receive them by the end of January. We are also working to obtain medical records for Mr. Kabbaj, who began experiencing health problems related to his previous diagnosis of COVID-19.

Mr. Kabbaj requested a sentencing adjournment on October 6, 2021, and November 12, 2021, for this same purpose. The Court granted these requests. I am hopeful that a thirty-day

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adjournment will provide sufficient time to obtain these materials and allow us to finalize our sentencing submission.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Your Honor's time and attention to this matter is appreciated.

Respectfully submitted,

/s/

David Stern

cc: AUSA Ni Qian (by ECF)
AUSA Andrew Rohrbach (by ECF)

Sentence is adjourned to 2/22/22 at 9:30am. Defense submission is due 2/1/22. Government submission is due 2/8/22.

SO ORDERED:

Richard M. Berman, U.S.D.J.